



June 27, 2022

Via ECF

The Honorable Gabriel W. Gorenstein
United States Magistrate Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007

*Re: In re: New York City Policing During Summer 2020 Demonstrations,
No. 20-CV-8924
This Filing is Related to all cases*

Dear Judge Gorenstein:

We write on behalf of all parties in these consolidated actions – Plaintiffs, Defendants and Union Intervenors - to submit to the Court, pursuant to its June 17, 2022 Order (ECF 608), a proposed stipulation designating certain of the documents the Court ordered the parties to produce to the Union Intervenors as Confidential Attorneys' Eyes Only documents and to clarify that the Union Intervenors are subject to the Confidentiality Order previously entered into in this case. The parties negotiated in good faith and have achieved agreement on these proposed terms.

The agreed-upon stipulation to be so ordered by the Court is attached to this letter.

Respectfully submitted,

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